

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

WINKLEVOSS CAPITAL FUND, LLC,

Plaintiff,

v.

CHARLES SHREM,

Defendant.

Case No. 18-cv-8250 (JSR)

**NOTICE OF MOTION TO  
QUASH**

PLEASE TAKE NOTICE that Plaintiff Winklevoss Capital Fund, LLC, and non-parties Winklevoss Capital Management, LLC, Winklevoss Bitcoin Trust, Gemini Trust Company, LLC, Cameron Winklevoss and Tyler Winklevoss, by and through their undersigned counsel, Meade Firm p.c., respectfully request and order quashing seven subpoenas served by Defendant Charlie Shrem on Matthew Gruchevsky, Silicon Valley Bank, Silvergate Bank, Chase Bank, Metropolitan Bank Holding Corp., Signature Securities Group Corporation, and Deutsche Bank Trust Corporation.

This motion to quash is brought on the basis of the reasons stated in the accompanying memorandum of law in support of motion to quash, the declaration of Cameron Winklevoss and the declaration of Sam Ferguson, with supporting exhibits.

On January 22, 2019, the parties and the non-parties held a telephonic conference with the Court. The Court subsequently ordered Plaintiff Winklevoss Capital Fund, LLC, and non-parties Winklevoss Capital Management, LLC, Winklevoss Bitcoin Trust, Gemini Trust Company, LLC, Cameron Winklevoss and Tyler Winklevoss to file their Motion to Quash by midnight on January 24. The Court further ordered Defendant to file an opposition to the Motion to Quash by midnight on January 29.

WHEREFORE, Plaintiff Winklevoss Capital Fund, LLC, and non-parties Winklevoss Capital Management, LLC, Winklevoss Bitcoin Trust, Gemini Trust Company, LLC, Cameron Winklevoss and Tyler Winklevoss respectfully request this Court enter an order quashing Shrem's subpoenas on the basis that the information sought is irrelevant, overbroad and unnecessarily invades the financial privacy interests of the moving parties. The movants request such other and further relief as the Court deems just and proper.

DATED: January 24, 2019

Respectfully submitted,

By: */s/ Tyler Meade*

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